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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation,

DEFENDANT.

Case No. 3:20-cv-00917-HZ

DECLARATION OF JEFFREY BELL

**(In Support of Defendant City of Portland's
Response to Plaintiffs' Motion for Class
Certification)**

I, Jeffrey Bell, declare as follows:

1. I am employed by the City of Portland as the Commander of the Professional Standards Division, which oversees the Internal Affairs Unit of the Portland Police Bureau

(“PPB” or “the Bureau”). I have been with PPB since March 2000. During my time with PPB, I have also served as a patrol officer, an officer in the transit police division, a patrol sergeant in different precincts, a sergeant in the personnel division, lieutenant in the Internal Affairs Division, and captain and acting commander of the Professional Standards Division.

2. There is currently an open investigation regarding the August 15, 2020 incident involving Plaintiff Thomas Dreier. That Investigation Case Number is 2020-C-0294. This is noted in Don’t Shoot _142509.

3. There is currently an open investigation regarding the RRT slide from the 2018 training materials. That Investigation Case Number is 2021-B-0034.

4. There is currently one closed investigation and one open investigation involving or related to Incidents 2 and 3 and Plaintiff Wrecksie. The Case Numbers are 2020-C-0334 and 2021-C-0075. Case Number 2020-C-0334 is the Wrecksie Investigation that is closed. Case Number 2021-C-0075 remains open. This is updated information since my deposition from October 29-2021 pages 126, line 2 through page 149, line 3.


5. As of today, there are six protest cases with incident dates in 2020 that were found with sustained findings for force allegations.

6. There are presently 18 pending cases from the George Floyd protests from 2020 and new cases continue to be opened.

7. I make this declaration in support of Defendant City of Portland’s Response to Plaintiffs’ Motion for Class Certification.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: February 1, 2022.



Jeffrey Bell